

COOLEY LLP
MICHELLE C. DOOLIN (179445) (doolinmc@cooley.com)
4401 Eastgate Mall
San Diego, CA 92121
Telephone: (858) 550-6000
Facsimile: (858) 550-6420

COOLEY LLP
BEATRIZ MEJIA (190948) (mejiab@cooley.com)
MATTHEW M. BROWN (264817) (brownmm@cooley.com)
101 California Street, 5th Floor
San Francisco, CA 94111-5800
Telephone: (415) 693-2000
Facsimile: (415) 693-2222

Attorneys for Defendant
COLE HAAN

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

TAMMIE DAVIS, an individual, on behalf of
herself and all others similarly situated,

Plaintiff,

v.

COLE HAAN, INC., a New York
Corporation; and DOES 1 through 50,
inclusive,

Defendants.

STEFANI CONCEPCION, an individual, on
behalf of herself and all others similarly
situated,

Plaintiff,

v.

COLE HAAN, INC., a New York
Corporation; and DOES 1 through 50,
inclusive,

Defendants.

Consolidated Case No. 11-cv-01826-JSW

**JOINT STIPULATION AND ~~PROPOSED~~
ORDER EXTENDING TIME ON DEADLINES
AND DATES RELATED TO ALL
DEADLINES**

Hon. Jeffrey S. White
Courtroom 11, 19th Floor

Pursuant to L.R. 6-2, counsel for Defendant Cole Haan and counsel for Plaintiffs (collectively, the “Parties”) stipulate as follows:

WHEREAS, Plaintiffs’ counsel contacted counsel for Cole Haan on May 9, 2012 to inform Cole Haan of their intention to join a new class action representative to this lawsuit and requested Cole Haan’s agreement to amend their pleadings to join that new class representative;

WHEREAS, Cole Haan has agreed to Plaintiffs’ request to join a new class representative to this lawsuit;

WHEREAS, Plaintiffs will file their First Amended Consolidated Complaint joining a new class representative on or before June 8, 2012;

WHEREAS, the Parties will need approximately an additional 60 days to complete discovery with respect to Plaintiffs’ proposed new class representative;

WHEREAS, the Parties agree to continue the deadlines relating to dispositive motions until after the Court has heard Plaintiffs’ Motion for Class Certification;

WHEREAS, the Parties are in the process of scheduling (among others) the new class representative’s deposition and Defendant’s 30(b)(6) deposition(s);

WHEREAS, the deadlines for the class certification motions, fact and expert discovery cutoffs, motions for summary judgment, and the pretrial conference and trial dates are as specified in the table below;

WHEREAS, there has been only one time modification to the below schedule by stipulation on April 9, 2012 [ECF 51];

WHEREAS, pursuant to such agreement, the Parties hereby seek an Order from the Court vacating the below-referenced dates, and rescheduling the deadlines and dates relating to class certification, fact and expert discovery, motions for summary judgment, and the pretrial conference and trial dates as specified below;

Now, therefore, the Parties stipulate and respectfully request that the Court order that the current deadlines and dates be rescheduled as specified in the table below:

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Deadline/Event	Current Dates	Proposed Dates
First Amended Consolidated Complaint is due	Not Applicable	June 8, 2012
Answer to Plaintiffs' First Amended Consolidated Complaint is due	Not Applicable	Consistent with Rules
Motion for Class Certification is due	June 18, 2012	August 27, 2012
Opposition to Plaintiffs' Motion for Class Certification is due	July 10, 2012	September 21, 2012
Reply in support of the Motion for Class Certification is due	July 24, 2012	October 5, 2012
Hearing on Plaintiffs' Motion for Class Certification	August 31, 2012	November ⁹ 2 , 2012
Close of fact discovery	June 29, 2012	October 12, 2012
Close of expert discovery	July 30, 2012	December 14, 2012
The first party's opening motion for summary judgment is due	August 10, 2012	January 18, 2013
The second party's opposition and cross-motion for summary judgment is due	August 24, 2012	February 1, 2013
The reply and opposition to the cross-motion for summary judgment is due	September 11, 2012	February 19, 2013
The second party's reply in support of the cross-motion for	September 18, 2012	February 26, 2013

Deadline/Event	Current Dates	Proposed Dates
summary judgment is due		
The last day for the Court to hear dispositive motions	October 12, 2012	March 22, 2013
Pretrial Conference	December 10, 2012	June 17, 2013 April 15, 2013
Trial	January 22, 2013	July 8, 2013 May 28, 2013

IT IS SO STIPULATED.

Dated: June 1, 2012

COOLEY LLP
MICHELLE C. DOOLIN
BEATRIZ MEJIA
MATTHEW M. BROWN

/s/ Matthew M. Brown

Matthew M. Brown
Attorneys for Defendants
COLE HAAN

Dated: June 1, 2012

PATTERSON LAW GROUP, APC
JAMES R. PATTERSON (211102)

/s/ James R. Patterson

James R. Patterson

Attorneys for Plaintiff
TAMMIE DAVIS

Dated: June 1, 2012

STONEBARGER LAW, APC
GENE J. STONEBARGER (209461)
RICHARD D. LAMBERT (251148)

/s/ Gene J. Stonebarger

Gene J. Stonebarger

Attorneys for Plaintiff
STEFANI CONCEPCION

FILER'S ATTESTATION

Pursuant to General Order No. 45, Section X, Subparagraph B, the undersigned attests that all parties have concurred in the filing of this document.

Dated: June 1, 2012

COOLEY LLP

/s/ Matthew M. Brown
Matthew M. Brown

Attorneys for Defendants
COLE HAAN

IT IS SO ORDERED, AS MODIFIED ABOVE

Dated: June 4, 2012


The Honorable Jeffrey S. White
United States District Judge

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